28

///

1	Kristina N. Holmstrom Nevada Bar No. 10086	
2	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.	
3	Wells Fargo Tower, Suite 1500 3800 Howard Hughes Parkway	
4	Las Vegas, NV 89169	
5	Telephone: 602-778-3700 kristina.holmstrom@ogletree.com	
6	Attorney for Defendant Sun Life Assurance	
7	Company of Canada	
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	Cynthia Ricks,	CASE NO.: 2:20-cv-01359-KJD-VCF
11	Plaintiff,	THE PARTIES' STIPULATION
12	v.	AND PROPOSED ORDER TO EXTEND TIME FOR DEFENDANT
13	Sun Life Assurance Company of Canada,	TO RESPOND TO PLAINTIFF'S COMPLAINT
14	Defendant.	
15	-	
16	Plaintiff Cynthia Ricks and Defendant Sun Life Assurance Company of Canada	
17	(collectively the "Parties"), by their respective counsel, hereby stipulate and agree that	
18	Defendant may have an extension of time through and including August 24, 2020 to respond	
19	to Plaintiff's Complaint. The stipulated extension reflects the responsive pleading deadline	
20	agreed to by the Parties, prior to the removal of the state court action to this Court. The	
21	additional time requested is to permit Defendant to investigate and prepare a responsive	
22	pleading to Plaintiff's Complaint.	
23	The Parties certify that this stipulation was done in good faith and not for the purposes	
24	of delay.	
25	///	
26	111	

28

WHEREFORE, the Parties jointly request that this Court adopt the proposed deadline 1 2 for Defendant's response to Plaintiff's Complaint as indicated above. 3 Respectfully submitted this 29th day of July 2020. 4 LAW OFFICES OF STEVEN J. PARSONS 5 STEWART, P.C. 6 By: /s/ Steven J. Parsons (with permission) 7 Steven J. Parsons Nevada Bar No. 363 8 10091 Park Run Drive, Suite 200 Las Vegas, NV 89145-8868 9 Tel.: (702) 384-9900 steve@sjplawyer.com 10 11 and 12 SCOTT E. DAVIS, P.C. 13 Scott E. Davis Nevada Bar No. 8788 14 8360 E. Raintree Drive, Suite 140 15 Scottsdale, AZ 85260-2687 Tel.: (602) 482-4300 16 davis@scottdavispc.com 17 Attorneys for Plaintiff Cynthia Ricks 18 19 IT IS SO ORDERED: 20 21 22 23 24 8-3-2020 DATED: 25 26 27

OGLETREE, DEAKINS, NASH, SMOAK & By: /s/ Kristina N. Holmstrom Kristina N. Holmstrom Nevada Bar No. 10086 Wells Fargo Tower, Suite 1500 3800 Howard Hughes Parkway Las Vegas, NV 89169 Tel.: (702) 369-6800 kristina.holmstrom@ogletree.com Attorneys for Defendant Sun Life Assurance Company of Canada UNITED STATES MAGISTRATE JUDGE

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. WELLS FARCO TOWER SUITE 1500, 3800 HOWARD HUGHER PARKWAY LAS VECAS, NV 89169 TELEPHONE: 702.369.6800

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

I hereby certify that on the 29th day of July 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF Systems for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants:

Steven J. Parsons LAW OFFICES OF STEVEN J. PARSONS 10091 Park Run Drive, Suite 200 Las Vegas, NV 89145-8868 steve@sjplawyer.com

Scott E. Davis SCOTT E. DAVIS, P.C. 8360 E. Raintree Drive, Suite 140 Scottsdale, AZ 85260-2687 davis@scottdavispc.com

Attorneys for Plaintiff Cynthia Ricks

s/ Diane M. Kelly

An Employee of Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

43681306.1